

OPERATOR INSPECTION-SPECIFIC INFORMATION

Inspection Date(s):	4/02/2014 through 4/03/2014		
Name of Operator:	Marathon Pipe Line LLC		
OPS Operator ID:	32147		
State/Other ID:			
H.Q. Address: 539 S Main Street Findlay, Ohio 45840	Company Officer:	Richard Abraham	
	Title:	Coordinator DOT Pipeline Safety Compliance	
	Phone Number:	419-421-2290	
	Fax Number:		
Web Site:	marathonpipeline.com	Email Address:	raabraham@marathonpetroleum.com
Employees Covered by OQ Plan:	900		
Contractors Covered by OQ Plan:	6000		
Total Mileage Represented:	0 miles, 1 service line		

Persons Interviewed	Title	Phone Number	Email Address
Richard Abraham	Coordinator DOT Pipeline Safety Compliance	419-421-2290	raabraham@marathonpetroleum.com
Dave Miller	DOT Professional OQ Coordinator	419-672-6684	davidmiller@marathonpetroleum.com
J. Clint Teel	Operations Specialist	618-540-8905	jamesteel@marathonpetroleum.com

To add rows, press TAB with cursor in last cell.

OPS/State Representatives	Region/State
James Watts	Illinois

To add rows, press TAB with cursor in last cell.

Remarks:

There are approximately 25 Marathon Pipe Line Company ("MPC") personnel of the 600 total identified above who could conduct maintenance, operations or emergency response for the service line located at the Wood River Barge facility. The service line is a 4 inch coated steel service that is approximately 2763 feet in length. The service line supplies gas for a flare stack that is utilized when filling barges with Crude Oil. For OQ qualified Contractors, Marathon has approximately a total of 6000 companywide which included refineries, pipeline, terminal and rail transport and Marathon Oil Company. As of the date of this inspection the only contract personnel who have worked on or are associated with the service line were Heath Consultants who conducted an instrument leakage survey and the aerial pilots who conduct the aerial patrols.

Mileage Covered by OQ Plan (by Company and State)

List each company and subsidiary separately, broken down by state (using 2-letter designation). If a company has intrastate and/or interstate mileage in several states, use one row per state. If there are both gas and liquid lines, use both the first and second table. For small gas operators (e.g. master meter, LP), use the third table.

Jurisdictional to Part 192 (Gas) Mileage

Company (Gas Operator)	Operator ID	State	Interstate Gathering	Intrastate Gathering	Interstate Transmission	Intrastate Transmission	Interstate Distribution*	Intrastate Distribution*	Remarks
Marathon Pipe Line LLC	32147	IL						0	They only have 1 Service Line

(To add rows, press TAB with cursor in last cell.)

Jurisdictional to Part 195 (Hazardous Liquid) Mileage

Company (Liquid Operator)	Operator ID	State	Interstate Transmission	Intrastate Transmission	Remarks

(To add rows, press TAB with cursor in last cell.)

Jurisdictional to Part 192 (Gas) Mileage – Small Operators

Company (Small Gas Operator)	Operator ID	State	Small Gas (e.g., master meter)*	LP*	Remarks

(To add rows, press TAB with cursor in last cell.)

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter n/a.

3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. * Please do not include Service Line footage. This should only be MAINS.

1 - Document Program Plan, Implementing Procedures and Qualification Criteria**1.01 Application and Customization of “Off-the-Shelf” Programs**

Does the operator’s plan identify covered tasks and does it specify task-specific reevaluation intervals for individuals performing covered tasks? **(Associated Protocols: 1.05, 2.01, 5.02)**

<input type="checkbox"/> No Issues Identified	Inspection Notes: Covered Task List is defined in Appendix B of the plan. Evaluation Frequency is defined in the covered task list. The plan was designed and built by Marathon and was not an Off- the-Shelf plan.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

1.02 Contractor Qualification

Does the operator employ contractor organizations to provide individuals to perform covered tasks? If so, what are the methods used to qualify these individuals and how does the operator ensure that contractor individuals are qualified in accordance with the operator’s OQ program plan?

* Verify that the operator’s written program includes provisions that require all contractor and subcontractor individuals be evaluated and qualified prior to performing covered tasks, unless the covered task is performed by a non-qualified individual under the direction and observation of a qualified individual. **(Associated Protocols: 1.05, 2.02, 3.02)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Marathon does utilize contractors. Contract Employee requirements are defined on page 18 of the plan. A contract employee is defined in the definitions on page 6 of the plan. Direct and observe of non-qualified employees is defined on pages 27-28. Marathon only accepts NCCER qualifications and requires the employees to be evaluated by their assessors and at a minimum, complete the AOC training.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

1.03 Management of Other Entities Performing Covered Tasks

Has the operator’s OQ program included provisions that require individuals from any other entity performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) be evaluated and qualified prior to task performance?

* Verify that other entities that perform covered task(s) on behalf of the operator are addressed under the operator’s OQ program and that individuals from such other entities performing covered tasks on behalf of the operator are evaluated and qualified consistent with the operator’s program requirements. **(Associated Protocols: 1.05, 2.02)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes:
--	-------------------

<input type="checkbox"/> Potential Issues Identified (explain)	Mutual Assistance Agreements are defined on page 37 of the plan. As of this inspection Mutual Assistance has not been utilized on the jurisdictional service line piping.
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

1.04 Training Requirements (Initial Qualification, Remedial if Initial Failure, and Reevaluation)

Does the operator's OQ program plan contain policy and criteria for the use of training in initial qualification of individuals performing covered tasks, and are criteria in existence for re-training and reevaluation of individuals if qualifications are questioned? **(Associated Protocols: 5.02)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Training requirements are defined on pages 11-14 of the plan. Specific training requirements are established by Team or Work Group titles and are maintained on the OQ web based program available to all Marathon personnel. If an employee changes Teams but has a certification such as NACE, they can retain these qualification requirements and receive the required training and reassessments to maintain these qualifications / certifications through the Marathon training and qualification program. Staff observed during the review of employees qualifications where an individual went to a supervisory role but is maintaining his qualifications for Corrosion Technician to retain his NACE certification and is maintaining the qualifications required for a Corrosion Technician which includes further training or refresher training required to maintain the qualifications. Re-evaluation is defined on pages 12-13. The plan covers the required reasons for retraining.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

1.05 Written Qualification Program

Did the operator meet the OQ Rule requirements for establishing a written operator qualification program and completing qualification of individuals performing covered tasks?

- * Verify that the operator's written qualification program was established by April 27, 2001.
- * Verify that the written qualification program identified all covered tasks for the operator's operations and maintenance functions being conducted as of October 28, 2002.
- * Verify that the written qualification program established an evaluation method(s) to be used in the initial qualification of individuals performing covered tasks as of October 28, 2002.
- * Verify that all individuals performing covered tasks as of October 28, 2002, and not otherwise directed or observed by a qualified individual were qualified in accordance with the operator's written qualification program. **(Associated Protocols: 3.01, 7.01)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: The initial plan was implemented by the required date of April 2001 and included establishing covered tasks. The jurisdictional service line was installed in October of 2007. Marathon does maintain a change log in
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	

	<p>Appendix M of the plan. Marathon Pipe Line Company ("MPC") defines the evaluation methods to be utilized on page 15 of the plan. These are Written Exam, Oral Exam, Performance Evaluation and Simulations. MPC did not utilize work performance history reviews to establish initial or subsequent qualifications for the initial qualifications of pipeline personnel and is no longer allowed to be utilized for re-qualification. This is defined on page 15 of the plan.</p>
<p>Check exactly one box above.</p>	

2 - Identify Covered Tasks and Related Evaluation Methods

2.01 Development of Covered Task List

How did the operator develop its covered task list?

* Verify that the operator applied the four-part test to determine whether 49 CFR Part 192 or 49 CFR Part 195 O&M activities applicable to the operator are covered tasks.

* Verify that the operator has identified and documented all applicable covered tasks. (**Associated Protocols: 8.01**)

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: MPC utilizes the four part test to establish the covered tasks. This is defined on pages 10-11 of the plan. The covered task list is located in Appendix B of the plan. Staff established during review of the electronic database that MPC utilizes a computer documentation system that indicates what parts of the four part test are applicable to each covered or non-covered task. Personnel can go to each covered task and see how the four part test was applied to establish if a task is covered.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

2.02 Evaluation Method(s) (Demonstration of Knowledge, Skill and Ability) and Relationship to Covered Tasks

Has the operator established and documented the evaluation method(s) appropriate to each covered task?

* Verify what evaluation method(s) has been established and documented for each covered task.

* Verify that the operator's evaluation program ensures that individuals can perform assigned covered tasks.

* Verify that the evaluation method is not limited to observation of on-the-job performance, except with respect to tasks for which OPS has determined that such observation is the best method of examining or testing qualifications. The results of any such observations shall be documented in writing. (**Associated Protocols: 3.01, 3.02**)

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Staff reviewed the Skill Assessment process utilized to qualify an employee. After an employee receives the required training they return to the service area and conduct this work with qualified personnel to apply the training while working in the field. This is documented in their On the Job Training books utilized to document when they utilized the skills. After completing the task for the given intervals they are then skill tested by an evaluator. Examples of completed Evaluation Checklists were reviewed to determine the
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	

	types of evaluations utilized when qualifying an employee.
Check exactly one box above.	

2.03 Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals)

Does the operator have a process for managing qualifications of individuals performing covered tasks during program integration following a merger or acquisition (applicable only to operators engaged in merger and acquisition activities)?

* Verify that the OQ program describes the process for ensuring OQ qualifications, evaluations, and performance of covered tasks during the merger with or acquisition of other entities. **(Associated Protocols 3.01 3.02)**

<input checked="checked" type="checkbox"/> No Issues Identified	Inspection Notes: There have been no mergers on the jurisdictional segment of the pipeline. The requirement for planning for mergers and or acquisitions is defined on pages 37-38 of the plan.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

3 - Identify Individuals Performing Covered Tasks

3.01 Development/Documentation of Areas of Qualification for Individuals Performing Covered Tasks

Does the operator's program document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?

* Verify that the operator's qualification program has documented the evaluation of individuals performing covered tasks.

* Verify that the operator's qualification program has documented the qualifications of individuals performing covered tasks. **(Associated Protocols: 4.02, 7.01)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Qualification documentation is maintained in their OQ databases. Staff reviewed the qualifications of 6 random employees currently at the Wood River Facility who could perform covered tasks on the service line. Exception reports are utilized to determine if the required training and qualifications are current for their current Team position.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

3.02 Covered Task Performed by Non-Qualified Individual

Has the operator established provisions to allow non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?

* Verify that the operator's program includes provisions for the performance of a covered task by a non-qualified individual under the direction and observation by a qualified individual. **(Associated Protocols: 2.01, 2.02)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Use of non-qualified individuals are defined on page 27-28 of the plan. Span of Control limits are accessible using the OQ Home Page that is available to all employees. Staff reviewed the ratios for covered tasks identified by MPC and observed no issues with the ratios. A majority of the covered task ratios were 1:1 with some being 3:1 and a couple having a maximum of 5:1.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

4 - Evaluate and Qualify Individuals Performing Covered Tasks

4.01 Role of and Approach to "Work Performance History Review"

Does the operator use work performance history review as the sole method of qualification for individuals performing covered tasks prior to October 26, 1999, and does the operator's program specify that work performance history review will not be used as the sole method of evaluation for qualification after October 28, 2002?

* Verify that after October 28, 2002, work performance history is not used as a sole evaluation method.

* Verify that individuals beginning work on covered tasks after October 26, 1999 have not been qualified using work performance history review as the sole method of evaluation. **(Associated Protocols: 2.02)**

<input type="checkbox"/> No Issues Identified	Inspection Notes: For pipeline personnel at MPC, Work Performance History review was not utilized to establish their initial qualifications and is not allowed for subsequent qualification. This is defined on page 15 of the plan.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input checked="" type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

4.02 Evaluation of Individual's Capability to Recognize and React to AOCs

Are all qualified individuals able to recognize and react to AOCs? Has the operator evaluated and qualified individuals for their capability to recognize and react to AOCs? Are the AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task? Has the operator established provisions for communicating AOCs for the purpose of qualifying individuals?

* Verify that individuals performing covered tasks have been qualified in recognizing and reacting to AOCs they may encounter in performing such tasks. **(Associated Protocols 3.01)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: AOC's are defined in the definition on page 5 of the plan. Each task has general or specific AOC's that apply and are evaluated during the initial or re-qualification process. Staff also reviewed the list of AOC's defined in Appendix C of the plan. Before conducting an evaluation the evaluator can search the covered task and determine what AOC's are applicable to the covered task and are utilized during the assessments utilized to establish qualifications.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

5 - Continued/Periodic Evaluation of Individuals Performing Covered Tasks

5.01 Personnel Performance Monitoring

Does the operator's program include provisions to evaluate an individual if the operator has reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?

* Verify that the operator's program ensures re-evaluation of individuals whose performance of a covered task may have contributed to an incident or accident.

* Verify that the operator has established provisions for determining whether an individual is no longer qualified to perform a covered task, and requires reevaluation.

(Specific Protocols: 2.02)

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Reasonable Cause Evaluations are defined on pages 19-20 of the plan. These are as follows, resulted in an accident or incident, unsatisfactory performance, performance that results in a near miss, away from job duties for more than 12 weeks due to leave, absence, special assignment, or change in job duties, tasks performed infrequently, unfamiliar with changes to equipment or procedures related to a covered task. They also have a reasonable cause flow chart on page 21 of the plan.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

5.02 Reevaluation Interval and Methodology for Determining the Interval

Has the operator established and justified requirements for reevaluation of individuals performing covered tasks?

* Verify that the operator has established intervals for reevaluating individuals performing covered tasks. (Associated Protocols: None)

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Periodic re-qualification is defined on page 19 of the plan. The re-qualification intervals are defined in the Covered Task List in Appendix B of the plan. Review of re-qualifications indicate the employees were re-qualified within the intervals defined by the plan.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

6 - Monitor Program Performance; Seek Improvement Opportunities

6.01 Program Performance and Improvement

Does the operator have provisions to evaluate performance of its OQ program and implement improvements to enhance the effectiveness of its program?

(Associated Protocols: None)

<input checked="checked" type="checkbox"/> No Issues Identified	Inspection Notes: Operator Qualification Metrics, process for monitoring performance and making improvements to the OQ program are defined on page 38 of the plan.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

7 - Maintain Program Records

7.01 Qualification “Trail”(i.e., covered task; individual performing; evaluation method(s); continuing performance evaluation; reevaluation interval; reevaluation records)

Does the operator maintain records in accordance with the requirements of 49 CFR 192, subpart N, and 49 CFR 195, subpart G, for all individuals performing covered tasks, including contractor individuals?

- * Verify that qualification records for all individuals performing covered tasks include the information identified in the regulations.
- * Verify that the operator's program ensures the retention of records of prior qualification and records of individuals no longer performing covered tasks for at least five years.
- * Verify that the operator's program ensures the availability of qualification records of individuals (employees, contractors and third party entities) currently performing covered tasks, or who have previously performed covered tasks. **(Associated Protocols: 1.05, 3.01)**

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: Record requirements are defined in the record keeping section on pages 39-40 of the plan. They include the 5 year requirement for record retention. The Official Copy of an employee's qualification is available in Ecompas / Maralearn computer programs. Unofficial copies are available on the learning and development web page that is updated monthly.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

8 - Manage Change

8.01 Management of Changes (to Procedures, Tools, Standards, etc.)

Does the operator's OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?

- * Verify that the operator's program identifies changes that affect covered tasks and how those changes are communicated, when appropriate, to affected individuals.
- * Verify that the operator's program identifies and incorporates changes that affect covered tasks.
- * Verify that the operator's program includes provisions for the communication of changes (e.g., who, what, when, where, why) in the qualification program to the affected individuals.
- * Verify that the operator incorporates changes into initial and subsequent evaluations.
- * Verify that contractors supplying individuals to perform covered tasks for the operator are notified of changes that affect task performance and thereby the qualification of these individuals.

(Associated Protocols 1.04)

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: The plan defines how changes are to be reviewed and authorized on pages 33-36. Marathon maintains a change log for the OQ Plan and is located in Appendix M.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

8.02 Notification of Significant Program Changes

Does the operator have a process for identifying significant OQ written program changes and notifying the appropriate regulatory agency of these changes once the program has been reviewed?

- * Verify that the operator's written program contains provisions to notify OPS or the appropriate regulatory agency of significant modifications to a program that has been reviewed for compliance.

(Associated Protocols: None)

<input checked="" type="checkbox"/> No Issues Identified	Inspection Notes: The plan defines how significant changes are to be addressed on pages 35-37. No changes have been made to the plan that required notification to PHMSA or state agencies. These are also maintained in the Change Log list located in Appendix M of the plan.
<input type="checkbox"/> Potential Issues Identified (explain)	
<input type="checkbox"/> N/A (explain)	
<input type="checkbox"/> Not Inspected	
Check exactly one box above.	

1. Wholesale changes made to an OQ Plan or Program, whether due to an overall effort to improve program performance, or due to a merger or acquisition that results in incorporating the best features of the competing plans and programs.
2. Recommend the operator send a letter to accompany the program that addresses the changes made to the program. The official notification should be addressed to headquarters.

9 – Field Inspection Findings

No field inspections were conducted during the review.

Additional Inspection Notes

Marathon Pipe Line Company has established and utilizes their own training program. The training is provided using their in-house training Staff. Outside training is provided at some points by outside vendors on specific equipment or processes but a Marathon Trainer is present to ensure Marathons procedures are being met and followed during the training being provided. A majority of the evaluations are conducted using Marathon trainers / evaluators who have field experience or are Subject Mater Experts SME's in the areas being evaluated.